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# Using Advanced Training Technology to Meet OSHA Requirements

presented by:

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at the:

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# OSHA Training Requirements

- 190 Standards (1910-1926) Require Training
  - Identify Structure or Format = 7
  - Require Training Evaluation = 15
  - Address Trainer Qualification = 10
  - Address Certification = 15
- Describe training topics or competency

# Potential Concerns about CBT

- Generic v.s. Site-Specific
- Interaction With Trainer
  - Limited or Delayed Responses
  - Limited or No Instructor Observation/Feedback
- No “Hands-On” Experience
- Training Hour Requirements

# OSHA Regulatory Language

- Site Specific Elements
  - HAZWOPER
  - Bloodborne Pathogens
  - Powered Industrial Trucks

# OSHA Regulatory Language

- Site-Specific Elements
  - Hazard Communication
  - Inorganic Arsenic

# OSHA Regulatory Language

- Trainer-Trainee Interaction
  - HAZWOPER
  - Bloodborne Pathogens
  - Powered Industrial Trucks

# OSHA Regulatory Language

- “Hands-On” Training
  - HAZWOPER
  - Bloodborne Pathogens
  - Asbestos (Shipyard & Construction)

# OSHA Regulatory Language

- “Hands-On” Training
  - Respiratory Protection
  - PPE
  - Permit-Required Confined Spaces



# OSHA Regulatory Language

- Training Hour Requirements
  - HAZWOPER
  - Asbestos (Shipyard & Construction)

# Additional OSHA Guidance/Statements

- Site-Specific Elements
  - HAZWOPER
  - Fall Protection
  - Hazard Communication

# Additional OSHA Guidance/Statements

- Trainer-Trainee Interaction
  - HAZWOPER
  - Bloodborne Pathogens

# Additional OSHA Guidance/Statements

- Hand-On Training
  - HAZWOPER
  - Powered Platforms for building maintenance
  - Process Safety Management
  - Respiratory Protection

# Additional OSHA Guidance/Statements

- Training Hour Requirements
  - HAZWOPER
  - Asbestos (Construction)

# Letters of Interpretation

- Letters are not policy; they clarify the application of an established policy or procedure
- Letters that address HAZWOPER CBT
  - R. Chinn, 10/20/1999 (Refresher)
  - J. Ward, 11/22/1994 (Refresher)
  - G. Joy, 10/11/1994 (Refresher)
- Letter that addresses BBP CBT
  - N. Wicklin, 01/15/1999
  - A. Jolly, 06/11/1997
- Available at [www.osha.gov](http://www.osha.gov)

# OSHA Statements in Letters

- “...self-paced interactive training can serve as a valuable training tool in the context of an overall training program” (HAZWOPER & BBP)
- “OSHA urges employers to be wary of relying solely on generic, ‘packaged’ training programs in meeting their training requirements.” (HAZWOPER & BBP)

# OSHA Statements in Letters

- “Equally important is the use of hands-on training and exercises to provide trainees with an opportunity to become familiar with equipment.....It is unlikely the sole reliance on a computer-based training program is likely to achieve these objectives” (BBP)
- “a telephone hotline or e-mail satisfies OSHA’s requirement for trainer access if the employee can ask and receive a response from a qualified trainer in a timely manner.” (HAZWOPER)



# OSHA Statements in Letters

- “ if access to a qualified trainer is provided through E-mail, the trainer must be available for an interactive on-line exchange whenever a trainee question arises” and “timely manner” means at the time the question arises” (BBP)

# OSHA Experiences with On-line Training

- Observations from testing two 8-hour refresher courses:
  - Can be thorough, concise, and up-to-date
  - Trainer accessibility and skills assessment not consistent
  - Training duration may fall far short
  - Some website connection instability

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# OSHA Experiences with On-line Training

- Accuracy and completeness of information cannot be assumed
- Generic training, no hands-on training

# How OSHA Evaluates Training

- Interviewing
- Observing work practices
- Reviewing records

# Summary

- Agency acknowledges limited regulatory language
- CBT may not fully satisfy all health and safety training requirements
- Open to new approaches
- Ultimate position is to protect and defend worker safety

